

IN RE:	:	
KRZYSZTOF SONTAG	:	CASE NO. 1:23-bk-00465-HWV
PATRICIA SONTAG	:	
Debtors	:	CHAPTER 13
	:	
COLLEGE SQUARE DEVELOPMENT, LLC	:	
Movant	:	
	:	
v.	:	
	:	
KRZYSZTOF SONTAG	:	
PATRICIA SONTAG	:	
Respondents	:	

AND NOW, come Debtors, Krzysztof Sontag and Patricia Sontag, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted.
3. Admitted.

4. Admitted.

5. Admitted in part and denied in part. Debtors have no knowledge. Strict proof is demanded.

6. Admitted in part and denied in part. The Lease speaks for itself. Strict proof is demanded.

7. Admitted.
8. Admitted in part and denied in part. The Modification of the Lease Agreement speaks for itself. Strict proof is demanded.
9. Admitted.
10. Admitted.
11. Denied. Debtors paid \$5,897.72 on April 2, 2025.
12. Admitted in part and denied in part. Section 4 of the Fourth Amendment speaks for itself. Strict proof is demanded.
13. Admitted.
14. Denied. See response to paragraph 11 above.
15. Admitted in part and denied in part. It is admitted that there is a post-petition arrearage. The exact amount of the post-petition arrearage is unknown. Strict proof is demanded.
16. Admitted. Further, Debtors hope to have the funds necessary to bring Movant current post-petition in the near future.
17. Admitted.

Request for Relief

18. Admitted.
19. Admitted in part and denied in part. Debtors will make an offer in the near future to bring Movant current.
20. Admitted in part and denied in part. Debtors believe and hereby aver that the consent to relief from the automatic stay is unenforceable.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
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Attorney for Debtors

DATED: 4/17/25

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF COLLEGE SQUARE DEVELOPMENT, LLC FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

KATE DERINGER SALLIE, ESQUIRE
PATRICIA B. JEFFERSON, ESQUIRE
PILLAR AUGHT LLC
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

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For Debtors

DATED: 4/14/2025